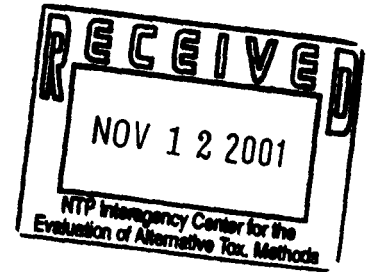


November 12, 2001



Dr. William S. Stokes
Director, NICEATM (MD EC-17)
National Institute of Environmental Health Sciences
P.O. Box 12233
Research Triangle Park, NC 27709

Via Fax: 919-541-0947

Dear Dr. Stokes:

I'm writing in response to the NEIHS' invitation for public comments on the use of non-animal (in vitro cell culture) methods to study the toxic effects of chemicals from acute (short-term) exposure.

I'm in favor of this type of testing and believe that the NEIHS should completely replace animal testing with in vitro cell culture testing. This type of testing has been considered for many years, but the government has delayed implementing this testing while animals continue to suffer and die. What is worse, the animals are suffering needlessly since animal testing has dubious validity for human applications. Animal testing is not reliable, reproducible, nor has it been proven relevant to humans.

Please mandate the NIEHS to adopt the new non-animal test methods IMMEDIATELY. Additionally, I'd like to see all government agencies that currently require the acute animal-poisoning studies immediately incorporate the in vitro cell culture method as a transitional means of reducing the number of animals killed. They should fully support the use of this method as an eventual replacement for lethal-dose poisoning studies. Finally, I urge the EPA to abide by its promise made to the animal protection community in October 1999 and incorporate the non-animal cell culture method into its HPV chemical program.

Sincerely,

Danielle E. Jesensky